

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Telecommunications Relay Service	)	CC Docket No. 98-67
And Speech-to-Speech Services	)	(DA 02-1826)
For Individuals with	)	
Hearing and Speech Disabilities	)	

**COMMENTS OF NENA AND APCO**

The National Emergency Number Association (“NENA”) and the Association of Public-Safety Communications Officials-International, Inc. (“APCO”) are pleased to respond to the FCC’s request for comment on a clarification of the “procedures for routing emergency calls by telecommunications relay services (“TRS”) centers.”<sup>1</sup> The fastest and most direct way of reaching emergency assistance is by dialing 9-1-1. Where that is not feasible, and in the spirit of making emergency calls through TRS as much like the routing of conventional voice communications as possible, the Commission’s prior order referred to the “appropriate 911 operator” and the “correct Public Safety Answering Point, or PSAP.”<sup>2</sup>

The Rules. This language tracks, for example, the requirements for the routing of 9-1-1 calls contained in Sections 20.3 and 20.18 of the Rules, defining “appropriate local emergency authority” and “designated PSAP.” The latter term is used throughout Section 20.18 and is

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<sup>1</sup> Public Notice, DA 02-1826, released July 29, 2002.

<sup>2</sup> Improved TRS Order, 15 FCC Rcd 5140, 5182 (2000).

functionally equivalent to “appropriate” because the designation of a PSAP is a clear prerogative of state or local authority.<sup>3</sup>

Elsewhere in the rules, however, minimum standards for TRS include:

(4) Handling of emergency calls. Providers must use a system for incoming emergency calls that, at a minimum, automatically and immediately transfers the caller to the nearest Public Safety Answering Point (PSAP). In addition, a CA must pass along the caller’s telephone number to the PSAP when a caller disconnects before being connected to emergency services.<sup>4</sup>

As used in the minimum standards, the term “nearest” is ambiguous as to its point of reference, the caller or the TRS center, but we believe nearest to the caller is intended. While the appropriate or designated PSAP is often the nearest to the caller, that is not always the case.

Since other sections of the FCC’s regulations defer to local or state authority in designating an appropriate PSAP to receive a 9-1-1 call from a given location, and since the aim of the TRS rules is to make relayed calls “functionally equivalent” to direct communications with a PSAP,<sup>5</sup> we support the clarification that would replace “nearest” with “appropriate.” As explained, the replacement term carries the same meaning as “designated by the proper local authority.”

We would suggest, however, that the revision not attempt to qualify “appropriate” as “most appropriate.” Since the FCC’s regulations defer to others to designate a receiving PSAP, the use of a comparative adjective is unnecessary.

The Means. Sending calls determined to be emergency in nature via TRS to the appropriate PSAP is typically accomplished today using manual procedures and three-party

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<sup>3</sup> Memorandum Opinion and Order, 12 FCC Rcd 22665, ¶98 (1997).

<sup>4</sup> Section 64.04(a)(4).

<sup>5</sup> 15 FCC Rcd at 5183.

conferencing to forward the call to 10-digit numbers at PSAPs. The Commission's prior order observed that one relay service provider had developed a fast transfer involving "two key strokes," and concluded that Section 64.04(a)(4) was feasible "as no party argued that it could not be done." *Id.*

Consistency and accuracy of the PSAP 10-digit number lists used by the TRS groups could be improved by use of a single source of that information. Single-source options include the NENA PSAP Registry database, which will soon include a product for commercial call centers that could be used for manual lookup by TRS as well. Use of this type of data base on a more mechanized basis, such as for point-and-click selection of a specific PSAP and automatic initiation of a three-party conference call, could require some development or options to be implemented in TRS call management systems.<sup>6</sup> Should NENA and APCO have more to add to this discussion in the near term, we will present the information in the reply round or via ex parte communication later.

Future Developments.<sup>7</sup> In the interest of prompting further discussion on reply or in ex parte comments, NENA and APCO offer the following:

The need to deliver emergency calls to the appropriate PSAP is a basic reason the Selective Routing process exists in E9-1-1 systems. Detailed databases are developed and maintained to assure this process. One possible option for the future is to utilize national 911 NXX numbers to access the PSAPs -- initially on a voice-only basis and later with pass-forward of the original caller's telephone number via the TRS call management systems. This would allow the PSAPs in turn to access the caller's Automatic Location Identification ("ALI") data

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<sup>6</sup> With assured funding, these improvements could be available in 18-24 months.

<sup>7</sup> No time frame is suggested for these upgrades, which are part of NENA's evolving "Future Path Plan." They likely would require a national approach to changing the telephone network.

within the E9-1-1 systems. Another option might be for TRS to use 911 NXX numbers to access the E9-1-1 Selective Router for the general area of the caller, pass forward the caller's number, and let the Selective Router do its normal routing process to the appropriate PSAP, with associated ALI access. The result is that the call takes on the appearance and handling of a regular E9-1-1 call.

NENA will continue discussion of these issues in its Non-Traditional Communications Technical Committee and its Accessibility Operations Committee, and APCO will employ similar methods of study. We look forward to reviewing the comments of others in this proceeding.

Respectfully submitted,

NENA AND APCO

By \_\_\_\_\_

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